Eastern Associated Terminals Company, LLC
Phosphate Handling and Storage Facility
Facility ID No. 0570014
Hillsborough County

Title V Air Operation Permit Renewal

DRAFT Permit Project No. 0570014-022-AV

Permitting and Compliance Authority:
Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: 813-627-2600
Fax: 813-627-2660

Title V Air Operation Permit Renewal

Draft Permit No. 0570014-022-AV

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EU No.	Baghouse Designation	Emission Unit Description
001	H	Shiploading
002	South	South Storage Building Elevator
003	A	Railcar Unloading
004	B	C7 to C8 or C9 Transfer Point
006	D	C9 to C4 Transfer Point OR C4 to C4A Transfer Point OR C10 to C4A Transfer Point
009	G	C5 to C6 Transfer Point
011	I	Storage Building Baghouse #1, SE or C9 or C10 to Storage Pile
012	II	Storage Building Baghouse #2, SW or Storage Pile to C9 or C10
013	III	Storage Building Baghouse #3, NW or C9 or C10 to Storage Pile
014	IV	Storage Building Baghouse #4, NE or Storage Pile to C9 or C10
015	NA	C2 to C3 or C7 Transfer Point without Baghouse B operating
016	NA	C8 to C10 Transfer Point without baghouse operating
017	NA	C4A to C5 Transfer Point without baghouse operating

Permittee:
Eastern Associated Terminals Co., LLC
3701 Causeway Blvd
Tampa, FL 33619

Draft Permit No.: 0570014-022-AV
Facility ID No.: 0570014
SIC No.: 51
Project: Fertilizer Products and Phosphate Rock Material Handling

This permit is for the renewal of a fertilizer product (MAP, DAP, GTSP) and phosphate rock material handling facility. This existing facility is located at 3701 Causeway Boulevard, Tampa, Hillsborough County, Fl UTM Coordinates: Zone 17-360.2 km East and 3088.9 km North; Latitude: 27° 55' 09" North and Longitude: 82° 25' 15" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-6, Title V Conditions version dated 06/23/06
Appendix SS-1, Stack Sampling Facilities version dated 10/07/96
Appendix CAM
Appendix A – O&M Plan
Appendix B – Emission Calculations

Effective Date: **[Month Day, Year]**
Renewal Application Due Date: **[Month Day, Year]**
Expiration Date: **[Month Day, Year]**

Environmental Protection Commission
of Hillsborough County

_____
Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a fertilizer products (MAP, DAP, GTSP) and phosphate rock material handling facility. Bulk materials are received by railcar and directed by conveyor belts to one of two areas in a storage building and then loaded into marine vessels for shipment offsite. The facility is permitted to handle monoammonium phosphate (MAP), diammonium phosphate (DAP), triple superphosphate (GTSP), dry phosphate rock, and wet phosphate rock. MAP, DAP, GTSP, and dry phosphate rock are stored inside of the storage building. Wet phosphate rock can be stored outdoors.

Particulate matter emissions are minimized by coating the MAP, DAP, and GTSP material with a dust suppressant and/or the utilization of ten baghouses. The facility may handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off as long as the applicable opacity standard is not exceeded.

Emission Unit No. 003, Railcar Unloading

Material (MAP, DAP, GTSP, wet phosphate rock, and dry phosphate rock) is delivered to the facility by railcar. The cars are emptied by a rotary dumper which attaches to the railcars and inverts them. The dumper is contained within a two-sided enclosure that also contains a roof. Plastic curtains hang at the ends of the building to partially enclose the front and back of the building. Particulate matter emissions from railcar unloading are controlled by a 154,670 DSCFM Micro-Pulsaire, Model 2G-8, baghouse.

Emission Unit Nos. 002, 004, 011 – 016 - Conveyors Transfer Points and Storage Building

Enclosed Conveyor Belt No. 2 (C2) conveys material from the railcar dumper building to either enclosed Conveyor Belt No. 7 (C7) or open Conveyor Belt No. 3 (C3). If material is directed to C7, the transfer point from C2 to C7 is enclosed within a building. C7 then conveys material to either enclosed Conveyor Belt No. 9 (C9) or to enclosed Conveyor Belt No. 8 (C8). If material is conveyed to C9, C9 conveys the material into the southeast side of the storage building. If material is directed to C8, C8 conveys material to enclosed Conveyor Belt No. 10 (C10), which then conveys the material into the northwest side of the storage building. Both sides of the storage buildings have conveyors (C9 to Storage Pile & C10 to Storage Pile) which feed radial stacker-reclaimers which stacks the material onto storage piles inside of the storage building. A front-end loader is used to load material onto the stacker-reclaimer when material is ready to be loaded into a ship.

Wet phosphate rock only is conveyed using C3. C3 conveys material to a radial stacker-reclaimer which stacks the material into open storage piles. A front end loader is used to load material onto the stacker-reclaimer when material is ready to be loaded into a ship. The stacker-reclaimer conveys material to Conveyor Belt No. 4 (C4) when it is ready to be loaded into a ship.

Particulate matter emissions from the C2 to C7 transfer point and the C7 to C8 or C9 transfer point (EU No. 004) are controlled by one 9,563 DSCFM Mikro-Pulsaire, Model No. 1F-2, baghouse. However, when this baghouse is not operating, the emissions from the C2 to C7 transfer point are controlled by an enclosure and have been designated as a new EU No. 015.

Particulate matter emissions from the C8 to C10 transfer point are controlled by one 4,500 ACFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse which is vented inside of the storage building. This baghouse is considered an insignificant emissions unit because it vents indoors. However, when this baghouse is not operating, the emissions from the C8 to C10 transfer point are controlled by an enclosure and have been designated as a new EU No. 016.

The storage building is controlled by four identical 79,000 ACFM American Air Filter, Model No. Ameripulse 10-312, baghouses. Two of the baghouses are located on the south side of the storage building (EU Nos. 011 and 012) and two are located on the north side of the building (EU Nos. 013 and 014). In addition, the baghouses on the south side of the storage building (EU Nos. 011 and 012) have an elevator associated with them. Material collected by these baghouses is returned to the storage building using the elevator. The elevator (EU No. 002) is controlled by a 270 DSCFM Flex Kleen, Model No. 84-CT-8, baghouse.

Emission Unit Nos. 006 Conveyor Transfer Point

When material is ready to be loaded into a ship, C9 conveys material from the southeast side of the storage building to enclosed Conveyor No. 4 (C4). The C9 to C4 transfer point is enclosed within a building. C4 then conveys material to Conveyor Belt No. 4A (C4A).

In addition, when material is ready to be loaded into a ship, Conveyor No. 10 (C10) conveys material from the northwest side of the storage building to C4A. The C4 to C4A transfer point and the C10 to C4A transfer points are enclosed within a building.

Particulate matter emissions from the C9 to C4 transfer point (EU No. 006) are controlled by a 4,050 DSCFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse. Particulate matter emissions from the C4 to C4A transfer point and the C10 to C4A transfer point are controlled by two identical 4,500 ACFM Mikro-Pulsaire, Model No. 64S-8-20, baghouses, which vent inside of the building. These baghouses are considered to be insignificant emissions units because they vents indoors.

Emission Unit Nos. 009 and 017 C5 to C6 Transfer Point

Material is conveyed from C4A to Conveyor Belt No. 5 (C5). This transfer point is enclosed within the same building as transfer points C4 to C4A and C10 to C4A. C5 conveys material to enclosed Conveyor Belt No. 6 (C6), which loads the ship using a ship

loading spout. C5 has side skirts only to allow the ship loader (gantry) to move and deposit materials throughout the shipholds.

Particulate matter emissions from the C5 to C6 transfer point (EU No. 009) are controlled by a 4,050 DSCFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse. Particulate matter emissions from the ship loading spout (EU No. 001) are controlled by a 46,800 DSCFM Haven, Alpha Mark 1 Size 30, baghouse.

Particulate matter emissions are minimized by coating the MAP, DAP, and GTSP material with a dust suppressant and/or the utilization of ten baghouses. The facility may handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off as long as the applicable opacity standard is not exceeded.

This facility is subject to Rule 62-296.711 F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter, for Material Handling, Sizing, Screening, Crushing and Grinding. Based on the Title V Permit Renewal application received November 30, 2010, this facility is not a major source of hazardous air pollutants (HAPs).

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

EU No.	Baghouse Designation	Emission Unit Description
001	H	Shiploading
002	South	South Storage Building Elevator
003	A	Railcar Unloading
004	B	C7 to C8 or C9 Transfer Point
006	D	C9 to C4 Transfer Point OR C4 to C4A Transfer Point OR C10 to C4A Transfer Point
009	G	C5 to C6 Transfer Point
011	I	Storage Building Baghouse #1, SE or C9 or C10 to Storage Pile
012	II	Storage Building Baghouse #2, SW or Storage Pile to C9 or C10
013	III	Storage Building Baghouse #3, NW or C9 or C10 to Storage Pile
014	IV	Storage Building Baghouse #4, NE or Storage Pile to C9 or C10
015	NA	C2 to C3 or C7 Transfer Point without Baghouse B operating
016	NA	C8 to C10 Transfer Point without baghouse operating
017	NA	C4A to C5 Transfer Point without baghouse operating

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

<u>These documents are provided to the permittee for information purposes only:</u>
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History/ID Number Changes

<u>These documents are on file with permitting authority:</u>
Initial Title V Permit Application issued October 2, 2000
Title V Air Operation Permit Administrative Correction issued September 10, 2002
Title V Air Operation Permit Renewal issued July 18, 2006
Title V Air Operation Permit Renewal Application Received November 30, 2010

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

The following conditions apply facility-wide:

1. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C. and Permit No. 0570085-010-AC]

2. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. and 4., F.A.C.]

3. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department or its' delegated agent, the Environmental Protection Commission of Hillsborough County. Nothing was deemed necessary and ordered at this time. [Rule 62-296.320(1), F.A.C.]

4. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. and 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not limited to, the following: [Rule 62-296.320(4)(c)2., F.A.C.]

A) Ensure all building doors are closed while processing material.
B) On a daily basis, check for equipment leaks and immediately repair any leaks found.
C) On a daily basis, check for and immediately clean up any spills.
D) Use tarps, covers, or shields at the shiphold as necessary.
E) Vacuum or clean paved roads to prevent dusting as necessary.
F) Apply water to unpaved roads to prevent dusting as necessary.
G) Limit vehicular speed to 15 MPH or less. Post signs as necessary.

5. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(199), F.A.C. The changes do not

include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.
C) The handling of any material not authorized by this permit.

6. Prior to performing any emissions testing, the permittee shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, and flow meters shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable determined within 10% of its true value. [Rule 62-297.310(5)(a) and (b), F.A.C.]

7. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301-429-5018

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68 and Rule 62-204.800, F.A.C.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County at:

Environmental Protection Commission
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: 813-627-2600 Fax: 813-627-2660

9. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404-562-9155, Fax: 404-562-9163

10. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

11. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rules 62-213.440(1)(b) and 62-4.070(3), F.A.C.]

12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the EPC and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900(7), F.A.C.]
{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. and 3., F.A.C.}

13. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. When calculating actual particulate matter emissions, the emission factors and control efficiencies listed in Appendix B shall be used. [Rules 62-210.370(3)(a)3. and (3)(c), F.A.C.]

14. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator

of the source to conduct compliance tests with the particulate emission standards which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

15. The permittee shall retain records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Rule 62-213.440(1)(b)2., F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

EU No.	Baghouse Designation	Emission Unit Description
001	H	Shiploading
002	South	South Storage Building Elevator
003	A	Railcar Unloading
004	B	C7 to C8 or C9 Transfer Point
006	D	C9 to C4 Transfer Point OR C4 to C4A Transfer Point OR C10 to C4A Transfer Point
009	G	C5 to C6 Transfer Point
011	I	Storage Building Baghouse #1, SE or C9 or C10 to Storage Pile
012	II	Storage Building Baghouse #2, SW or Storage Pile to C9 or C10
013	III	Storage Building Baghouse #3, NW or C9 or C10 to Storage Pile
014	IV	Storage Building Baghouse #4, NE or Storage Pile to C9 or C10
015	NA	C2 to C3 or C7 Transfer Point without Baghouse B operating
016	NA	C8 to C10 Transfer Point without baghouse operating
017	NA	C4A to C5 Transfer Point without baghouse operating

The following specific conditions apply to the above emission units:

A.1. In order to ensure compliance with the opacity standard specified in A.2. below, the following limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A) The permittee shall handle only the following materials and shall not exceed the following maximum hourly transfer rates.

1. When transferring material from the railcars to the storage building or transferring material directly from the railcars to a ship:

Dry and Wet Rock	2,050 tons/hour
MAP/DAP/GTSP	1,700 tons/hour

2. When transferring material from the storage building to ships:

Dry and Wet Rock	2,800 tons/hour
MAP/DAP/GTSP	2,500 tons/hour

B) The maximum annual material throughput shall not exceed the following per any twelve consecutive month period:

1. Dry Phosphate Rock: 1,250,000 tons
2. MAP/DAP/GTSP: 3,600,000 tons
3. Wet Phosphate Rock: 5,600,000 tons

C) When wet phosphate rock is handled, the moisture content of the wet rock shall be a minimum of 15%.

A.2. The permittee shall not cause, permit, or allow any visible emissions (five percent opacity) from any emissions unit, transfer point, storage building, or shiphold at this facility except at the point where material is being discharged to the hold of a ship from a conveyor system. When the conveyor and/or hatch covering is moved, an opacity of 10 percent will be allowed. [Rule 62-296.711(2)(a), F.A.C.]

A.3. In order to ensure compliance with the opacity standard specified in A.2. above, the following limitations and restrictions shall apply: [Rule 62-4.070(3), F.A.C.]

A) All doors, windows, and other openings in the material storage building and transfer point enclosure(s) shall be kept closed while material is being processed.
B) During the operation of the stacker/reclaimer(s) no emissions shall be vented to the exterior of the storage building except those passing through the building baghouses.
C) The maximum number of transfer points shall not exceed ten.
D) All dust laden exhaust from each emission unit shall be vented to the respective baghouse(s). The baghouse(s) shall be in operation when the emission unit(s) is being utilized except as specified in Specific Condition No. A.4.
E) The baghouses shall be in operation when handling dry phosphate rock.

A.4. The permittee is authorized to handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off provided the following requirements are satisfied: [Rules 62-4.070(3), 62-210.200(239), and 62-210.300(2)(a), F.A.C. and Permit No. 0570014-015-AC]

A) Visible emissions from the material handling and storage operation shall not exceed 5% opacity as specified in Specific Condition No. A.2.
B) The MAP, DAP, GTSP, and wet phosphate rock shall be sufficiently coated with a non-hazardous oil or dust suppressant in sufficient quantity to ensure compliance with the opacity standard specified in Specific Condition No. A.2.
C) The particulate matter emission control device (baghouse) shall be put back online for any emission unit or transfer point when visible emissions from that emission unit or transfer point are greater than the opacity standard specified in Specific Condition No. A.2.
D) A documented training program shall be instituted to instruct employees in the opacity requirements and reasonable precautions.
E) The permittee shall ensure that a trained reader performs visible emissions observations on all transfer points and emission units in operation that day. The

visible emissions observation shall be performed once a day while the transfer points and emission units are in operation. The permittee shall maintain an emissions reading log. The log shall contain the visible emissions reading and any actions taken by the permittee to correct conditions that cause excess emissions. If excess emissions are observed, the permittee shall timely act to remedy and correct the condition causing the excess emissions. If timely corrective measures are not available, the permittee shall cease unloading or loading operations until the source of the excess emissions is corrected.

A.5. As requested by the permittee, the maximum allowable and potential particulate matter emissions from each emission unit and the hours of operation shall not exceed the following per any twelve consecutive month period: [Rules 62-296.711(2)(b) and 62-4.070(3), F.A.C.]

A)

EU No.	Flowrate (DSCFM)	Gr/DSCF	Hrs/Year	Tons/Year
001	46,800	0.02	2240	9.0
002	270	0.02	3373	0.1
003	154,670	0.01	3373	24.7
004	9,563	0.02	3373	3.1
006	4,050	0.03	2240	1.2
009	4,050	0.03	2240	1.2
011	77,818	0.01	3373	12.4
012	78,329	0.01	3373	12.5
013	78,667	0.01	3373	12.6
014	73,205	0.01	3373	11.7

B) The hours of operation listed above apply only when the baghouse fans are in operation.
C) Hours of operation while the baghouses are turned off are not limited.

A.6. In order to ensure compliance with the allowable particulate matter emissions specified in Specific Condition No. A.5. above, the permittee shall install, operate and maintain the following devices on each baghouse: [Rule 62-4.070(3), F.A.C.]

A) A device capable of monitoring the pressure differential across the baghouse. The monitoring device shall be maintained in working order and shall be calibrated and adjusted to allow the pressure drop to be determined within 10% of its true value.
B) A time elapsed meter on each baghouse.

A.7. The permittee shall maintain compliance with the requirements of the attached Operation and Maintenance Plan (Appendix A). [Rules 62-296.700(6) and 62-4.070(3), F.A.C. and Permit No. 0570014-015-AC]

A.8. The permittee shall perform the following emissions tests as specified: [Rules 62-297.310(7) and 62-4.070(3), F.A.C. and Permit No. 0570014-015-AC]

A) Test all emission units as follows for visible emissions once per federal fiscal year (October 1 – September 30) in order to demonstrate compliance with the opacity standard specified in Specific Condition No. A.2.:

    1) While handling dry phosphate rock.
    2) While handling MAP, DAP, or GTSP with the baghouses turned off.
    3) If the baghouse(s) has operated during the fiscal year, test the baghouse(s) while handling MAP, DAP, or GTSP.
    4) Test the north and south doors of the fertilizer storage building for visible emissions during normal operations.

B) Test the exhaust of Baghouse A (EU No. 003) once per federal fiscal year for particulate matter emissions.
C) Baghouses I, II, III, and IV (EU Nos. 011 – 014) shall be tested for particulate matter emissions. The particulate matter test shall be performed once per federal fiscal year on one of the baghouses. The testing shall be done so that each baghouse is tested at least once during a five year cycle.
D) The permittee shall test each emission unit for visible emissions the next time wet phosphate rock or dry phosphate rock is transferred through the emission unit.
E) When testing emissions from ship loading, the visible emissions test shall be performed at the baghouse exhaust (EU No. 001) and at the shiphold.
F) If possible, testing of emissions from the ship loading baghouse exhaust (EU No. 001), the shiphold, the partial enclosure on the C5 to C6 transfer point, and the baghouse exhaust from Baghouse G (EU No. 009) shall be conducted concurrently.
G) Testing of emissions from the baghouse exhausts and corresponding pickup points shall be conducted concurrently.

A.9. Compliance with the emission limitations specified in Specific Condition Nos. A.2. and A.5. shall be determined using EPA Methods 1, 2, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 test shall be at least thirty (30) minutes in duration and shall be conducted concurrently with the Method 5 test, if a Method 5 test is required. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-296.711(3) and 62-4.070(3), F.A.C. and Permit No. 0570014-015-AC]

A.10. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the material handling rates specified in Specific Condition No. A.1. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher

capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates, including the type of material being handled during the compliance test, information on whether or not the baghouse was in operation, the pressure drop across each baghouse, the hourly processing rate, and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

A.11. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rules 62-297.310(7)(a)9., F.A.C.]

A.12. The permittee shall file a report with the Environmental Protection Commission of Hillsborough County on the results of each compliance test as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Environmental Protection Commission of Hillsborough County to determine if the test was properly conducted.[Rule 62-297.310(8), F.A.C.]

A.13. This facility is subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64 and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

A.14. In order to demonstrate compliance with Specific Condition Nos. A.1. and A.5., the permittee shall develop and maintain a monthly recordkeeping system. The records shall be maintained onsite for five years and shall be made available upon request to any local, state, or federal air pollution agency. The records shall include, but not limited to, the following: [Rule 62-4.070(3), F.A.C. and Permit No. 0570014-015-AC]

A) Month/Year
B) Amount and type of material received (tons).
C) Amount and type of material loaded into ships (tons).
D) Periods when the control equipment was used while handling material.
E) Hours of operation for each baghouse
F) Rolling twelve month total of B), C), and E) above.
G) Records as required by the O&M Plan specified in Specific Condition No. A.7.
H) Records as specified in Specific Condition No. A.4.E)